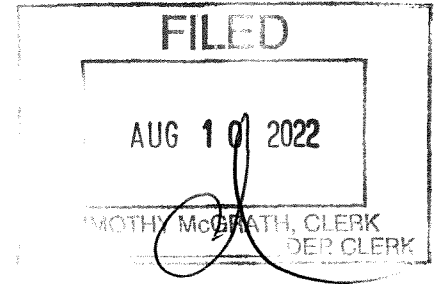


August 8, 2022

To: United States Bankruptcy Court Eastern District Of Pennsylvania
Re: Patrick R Stonich, Joseph C Motto: **Bankruptcy No. 22-11531-PMM**

Response on Motion to Dismiss Pursuant to 11 U.S.C Section 1307



To Whom It May Concern:

We are in receipt of the letter dated July 21, 2022, regarding a motion to dismiss the Bankruptcy Case (**No. 22-11531-PMM**) filed by our current attorney Michael McCrystal of Emmaus, Pennsylvania.

We received this notice in the mail on July 25, 2022, and had a face-to-face meeting with our attorney on July 29, 2022. I was informed on July 25, 2022, that our scheduled meeting of creditors on July 26, 2022, was canceled.

During our face-to-face meeting with Attorney McCrystal, we were informed that Chapter 13 would not be an option for us due to the amount of debt owed. I and Joe originally wanted to file under Chapter 7 but were advised to utilize Chapter 13 as our best option. During this meeting, we were then told that we could not file under Chapter 13 and had to convert to Chapter 11. We were informed of the increase in attorney fees and the difference in filing fees to the court, not to mention lost time in converting our case.

We are now in the process of changing attorney representation because we feel that we have lost valuable time in our case and not getting the proper support. We have a meeting set up on Thursday, August 11, 2022, at 4 pm to start the process and move forward. We do know that we will be converting the case to not be filed under Chapter 13, we will have to wait to discuss the best option with our new attorney.

We apologize for the delay in this letter as we understand the cut-off date has passed. We have been trying to work with Mr. McCrystal on getting a response sent, but he will not send a response without all new fees paid upfront. Given the fact that Mr. McCrystal knew exactly the amount of our debt when filing, we are still unsure as to why he filed incorrectly.

Please consider this request as we are trying to organize and come up with a plan to properly move forward.

We can be reached at (215) 804-7081 or via email at pstonich@mac.com for any questions or concerns. Our home address is 6474 Trickle Creek Road Bath, PA 18014

Sincerely,


Patrick R Stonich

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Patrick R Stonich
Joseph C Motto

Debtors

Chapter 13

Bankruptcy No. 22-11531-PMM

HEARING TO BE HELD:

Date: 09/08/2022

Time: 10:00 A.M.

**Place: U.S. Bankruptcy Court
The Gateway Building
201 Penn St
4th Floor Courtroom
Reading, PA 19601**

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Scott F. Waterman, Esq., Standing Chapter 13 Trustee, has filed a *Trustee's Motion to Dismiss Pursuant to 11 U.S.C. Section 1307* with the Court for dismissal of this case.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before Thursday, August 4, 2022 you or your attorney must do ALL of the following:

(a) file an answer explaining your position at

U.S. Bankruptcy Court
The Gateway Building
Office of the Clerk, Room 103
201 Penn St
Reading, PA 19601

If you mail your answer to the Bankruptcy Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Rolando Ramos, Esq.
for
Scott F. Waterman, Esq.
Standing Chapter 13 Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before The Honorable Patricia M. Mayer, United States Bankruptcy Judge, on Thursday, September 08, 2022 at 10:00 a.m., at U.S. Bankruptcy Court, The Gateway Building, 201 Penn St, 4th Floor Courtroom, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List and you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (610) 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Date: July 21, 2022